

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

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| IN RE: | § |
| | § Chapter 11 |
| ENERGY XXI LTD, <i>et al.</i> , ¹ | § |
| | § Case No. 16-31928 |
| DEBTORS. | § |
| | § Joint Administration Requested |
| | § |
| | § |

**NOTICE OF APPEARANCE UNDER BANKRUPTCY RULE 9010(B) AND
REQUEST FOR SERVICE OF ALL NOTICES, PLEADINGS, AND ORDERS
PURSUANT TO BANKRUPTCY RULES 2002, 3017, AND 9007**

PLEASE TAKE NOTICE that, pursuant to Rules 2002, 3017, 9007, and 9010 of the Federal Rules of Bankruptcy Procedure, the undersigned counsel hereby appears for the ad hoc committee of second lien noteholders (the “Ad Hoc Committee”), and requests copies of all notices, pleadings, orders, and other documents brought before this Court with respect to the above-captioned proceedings, whether formal or informal, be served on the Ad Hoc Committee by and through its counsel, as follows:

Dennis F. Dunne (*pro hac pending*)
Samuel A. Khalil (*pro hac pending*)
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¹ The Debtors in these chapter 11 cases and the last four digits of their respective federal tax identification numbers are: Anglo-Suisse Offshore Pipeline Partners, LLC (9562), Delaware EPL of Texas, LLC (9562), Energy Partners Ltd., LLC (9562), Energy XXI GOM, LLC (0027), Energy XXI Gulf Coast, Inc. (8595), Energy XXI Holdings, Inc. (1638), Energy XXI, Inc. (2108), Energy XXI Leasehold, LLC (8121), Energy XXI Ltd (9286), Energy XXI Natural Gas Holdings, Inc. (7517), Energy XXI Offshore Services, Inc. (4711), Energy XXI Onshore, LLC (0308), Energy XXI Pipeline, LLC (5863), Energy XXI Pipeline II, LLC (8238), Energy XXI Services, LLC (3999), Energy XXI Texas Onshore, LLC (0294), Energy XXI USA, Inc. (8552), EPL of Louisiana, L.L.C. (9562), EPL Oil & Gas, Inc. (9562), EPL Pioneer Houston, Inc. (9749), EPL Pipeline, L.L.C. (1048), M21K, LLC (3978), MS Onshore, LLC (8573), Natural Gas Acquisition Company I, LLC (0956), Nighthawk, L.L.C. (9562), and Soileau Catering, LLC (2767). The location of the Debtors’ U.S. corporate headquarters and the Debtors’ service address is: 1021 Main Street, Suite 2626, Houston, Texas 77002.

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PLEASE TAKE FURTHER NOTICE that this request includes, without limitation (i) all notices and papers referred to in Bankruptcy Rules 2002, 3017, 9007, 9010 and 1109(b), (ii) all notices of hearings and entry of orders, (iii) every order signed in this case, and (iv) every pleading or report filed in this case, including, without limitation, schedules, statements of affairs, operating reports, motions, applications, complaints, demands, requests, petitions, plans of reorganization, disclosure statements, answering or reply papers, and memorandum briefs in support of any of the foregoing.

PLEASE TAKE FURTHER NOTICE that neither this notice nor any prior or later appearance, pleading, claim, or suit shall waive any right of the Ad Hoc Committee to (1) have final orders in non-core matters entered only after de novo review by a District Court judge, (2) trial by jury in any proceeding so triable in this case or any case, controversy, or proceeding

related to this case, (3) have the District Court withdraw the reference in any matter subject to mandatory or discretionary withdrawal, (4) any objection to the jurisdiction of the Bankruptcy Court for any purpose, (5) any election of remedy, or (6) any other right(s), claim(s), defense(s), setoff(s) or recoupment(s), under agreements, in law, in equity, or otherwise, all of which are expressly reserved.

Dated: April 14, 2016

Respectfully submitted,

**MILBANK, TWEED, HADLEY & McCLOY
LLP**

By: /s/ Dennis F. Dunne

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**ATTORNEYS FOR THE AD HOC
COMMITTEE**

CERTIFICATE OF SERVICE

I certify that a true and correct copy of the foregoing Notice of Appearance was served by CM/ECF to all parties entitled to receive such notice.

/s/ Bob B. Bruner

Bob B. Bruner